The Honorable Michael Powell Federal Communications Commission 445 12th Street SW Washington, DC 20554

Dear Chairman Powell:

The FCC will soon make a critical decision on media ownership policy that could affect the future course of our democracy. At stake, as you know, are the rules and policies governing U.S. media ownership of the nation's radio and television broadcasters, TV networks, and newspapers. You and your colleagues are well aware of the important role these media outlets play in providing the public with a diverse array of local and national information and analysis.

According to reports, the Commission is developing a "diversity index" that will serve as a form of universal measurement on media ownership. Such a measure, we understand, will be used to analyze individual media markets in order to determine whether cross-ownership limits should be eliminated, modified, or maintained. Press reports also suggest that some of the specific rules under review may be subject to new policies as well.

We have grave doubts that any single measure can effectively analyze the complexities of the media marketplace, in terms of its impact on journalism, citizen access to information, and competition. Such quantitative-let alone qualitative-methodological measures attempting to serve as holistic approaches are likely to be very imprecise.

As leading scholars in the field of social science and mass communications, we urge you to release to the public any proposed such measures in advance of their enactment. There must be serious scholarly and public debate about the efficacy of any proposed new measure on media ownership. Indeed, we look forward to examining and commenting on any proposal, so that the scholarly community can help make the most informed Commission decision possible on this important issue.

We are sure you, as we, believe that informed debate and discourse on the analytical underpinnings of what the FCC may propose can only further your goal of developing an approach to media policy regulation that is supported by sound scholarship.

Sincerely,

Cc.

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Senator Hollings
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Representative Dingell
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